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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**RESPONSE OF NO OBJECTION  
TO THE ACWA/JPIA MOTION TO  
FILE SUBROGATION PROOF OF  
CLAIM, AND OBJECTING TO FILING  
VICTIM CLAIM**

Related Dkt. Nos. 5215-5217

[No Hearing Requested]

1 The Official Committee of Tort Claimants (the “TCC”) in the above-captioned cases (the  
2 “Chapter 11 Cases”) of PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “Debtors”) hereby files this response of no objection to the  
4 motion of the Association of California Water Agencies Joint Powers Insurance Authority  
5 (“ACWA/JPIA”), which requests an order permitting it to file a late-filed “subrogation claim” in  
6 the Chapter 11 Cases [Dkt. Nos. 5215-5217], on the official “Proof of Claim (Wildfire Related –  
7 Subrogation Insurers)” form. The TCC objects to an order allowing ACWA/JPIA to file a victim’s  
8 “Proof of Claim (Fire Claim Related)” on the basis that the ACWA/JPIA did not file a motion  
9 requesting such relief.

10  
11 Dated: March 3, 2020

**BAKER & HOSTETLER LLP**

By: /s/ Robert A. Julian  
Robert A. Julian

*Counsel for The Official Committee of Tort  
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